

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**BRADLEY COTTRELL, on behalf of the
ESTATE OF BERNARD DALE
COTTRELL,**

Plaintiff,

v.

**Civil Action No. 2:18-cv-01281
Honorable Thomas E. Johnston**

**NATHAN SCOTT STEPP, Individually as
a member of the West Virginia State
Police; ZACH W. HARTLEY, Individually
as a member of the West Virginia State
Police; OKEY S. STARSICK, Individually
as a member of the West Virginia State
Police; ROBERT B. HICKMAN,
Individually as a member of the Roane
County Sheriff's Department; ROANE
COUNTY SHERIFF'S DEPARTMENT;
and WEST VIRGINIA STATE POLICE,**

Defendants

DEFENDANT DEPUTY HICKMAN'S MOTION FOR SUMMARY JUDGMENT

COMES NOW Defendant Deputy Robert B. Hickman, by and through his counsel, the law firm of Bailey & Wyant, PLLC, Charles R. Bailey, John P. Fuller and Jeffrey M. Carder and for reasons more fully supported in the Memorandum of Law filed contemporaneously herewith, moves this Court for entry of an Order granting summary judgment in his favor and against the Plaintiff.

WHEREFORE, Defendant Deputy Robert B. Hickman respectfully moves this Court for entry of an Order granting summary judgment to Defendant Robert B. Hickman and against the Plaintiff and for all other relief that this Court deems just and appropriate.

DEPUTY ROBERT B. HICKMAN,

By Counsel,

/s/ John P. Fuller

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Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing “**Defendant Deputy Hickman’s Motion for Summary Judgment**” was served upon the following parties through the Court’s Electronic Case Filing (ECF) system on this day, Monday, September 9, 2019:

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